

**UNITED STATES BANKRUPTCY COURT  
DISTRICT OF NEW JERSEY**

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In re:

**LTL MANAGEMENT LLC,<sup>1</sup>**

Debtor.

Chapter 11

Case No.: 23-12825 (MBK)

Honorable Michael B. Kaplan

**SUPPLEMENTAL CERTIFICATION OF SUNNI P. BEVILLE IN SUPPORT OF THE APPLICATION OF THE OFFICIAL COMMITTEE OF TALC CLAIMANTS TO RETAIN AND EMPLOY BROWN RUDNICK LLP AS CO-COUNSEL EFFECTIVE AS OF APRIL 14, 2023**

Pursuant to 11 U.S.C. § 1746, I, hereby declare:

1. I am an attorney at law admitted to practice in the courts of the State of Massachusetts and the United States District Court for the District of Massachusetts.

2. I am also Managing Director of the Dispute Resolution & Restructuring Department and a Partner in the Bankruptcy & Corporate Restructuring Practice Group at Brown Rudnick LLP (“Brown Rudnick”) and am duly authorized to make this supplemental certification (the “Supplemental Certification”) on behalf of Brown Rudnick. Brown Rudnick is proposed co-counsel to the Official Committee of Talc Claimants (the “Committee” or “TCC”) of LTL Management LLC, the debtor and debtor-in-possession (the “Debtor”) in the above-captioned case.

3. On May 3, 2023, Brown Rudnick filed the *Application of the Official Committee of Talc Claimants to Retain and Employ Brown Rudnick LLP as Co-Counsel Effective as of April 14, 2023* [Dkt. No. 400] (the “Application”)<sup>2</sup> seeking entry of an order authorizing and approving the retention and employment of Brown Rudnick as co-counsel to the TCC. In support of the Application, I submitted the *Certification of Professional in Support of Application for Retention*

<sup>1</sup> The last four digits of the Debtor’s taxpayer identification number are 6622. The Debtor’s address is 501 George Street, New Brunswick, New Jersey 08933.

<sup>2</sup> Capitalized terms used in this Supplemental Certification but not otherwise defined herein shall have the meanings ascribed to them in the Application.

of *Professional* (the “Original Certification”) attached thereto as Exhibit B, which is incorporated by reference.

4. On May 8, 2023, the Court ordered the appointment of Gary Russo and Eric Green to serve as co-mediators in accordance with mediation protocols set forth therein (the “Mediation Order”). [Dkt. No. 459].

5. The Application provides that Brown Rudnick will file a supplemental certification if any new relevant facts or relationships are discovered or arise with respect to its conflicts disclosures made therein. Application ¶ 27. I now submit this Supplemental Certification in accordance with paragraph 27 of the Application in light of the Mediation Order.

6. Brown Rudnick represents Eric Green in the following two engagements:

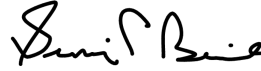
- a. in Mr. Green’s capacity as the Trustee of the PSAN PI/WD Trust established in the bankruptcy cases of *TK Holdings, Inc.* proceeding in the Bankruptcy Court for the District of Delaware, Judge Brendan Shannon presiding, under the case captioned *In re TK Holdings Inc.*, Case No. 17-11375; and
- b. in Mr. Green’s capacity as Court-Appointed Special Master of the United States Department of Justice Individual Restitution Fund established in the criminal case proceeding in the U.S. District Court for the Eastern District of Michigan, Judge Carem Steeh presiding, under the case captioned *United States of America v. Takata Corporation*, Case No. 16-CR-20810-04.

7. Brown Rudnick does not believe these engagements of Mr. Green, a Co-Mediator, on matters unrelated to this case create any conflicts.

8. Brown Rudnick will continue to provide supplemental disclosures as provided in the Application.

Pursuant to 11 U.S.C. § 1746, I declare under penalty of perjury that the foregoing is true and correct to the best of my knowledge.

Dated: May 18, 2023

A handwritten signature in black ink, appearing to read "Sunni P. Beville", written over a horizontal line.

Sunni P. Beville